

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

SECURITIES AND EXCHANGE COMMISSION,)
Plaintiff,)
v.)
TELEXFREE, INC.,)
TELEXFREE LLC,)
JAMES M. MERRILL,)
CARLOS N. WANZELER,)
STEVEN M. LABRIOLA,)
JOSEPH H. CRAFT,)
SANDERLEY RODRIGUES DE VASCONCELOS,) 1:14-CV-11858-NMG
SANTIAGO DE LA ROSA,)
RANDY CROSBY and)
FAITH R. SLOAN,)
Defendants,)
and)
TELEXFREE FINANCIAL, INC.,)
TELEXELECTRIC LLP and)
TELEX MOBIL HOLDINGS, INC.,)
Relief Defendants)

)

COUNSEL'S MOTION TO WITHDRAW

NOW COMES Ludovino Gardini, counsel for defendant Sanderley Rodrigues de Vasconcelos in the above-captioned matter, and respectfully requests that this Court grant leave for counsel to withdraw from representation. As grounds therefor, counsel states as follows:

There has been a breakdown in the attorney-client relationship and a breakdown in communication such that the undersigned counsel believes he can no longer adequately represent

the interests of Mr. Rodrigues. The undersigned counsel and the defendant have been unable to reasonably agree on the scope and course of representation. Further, pursuant to Massachusetts Rules of Professional Conduct Rule 1.16 (4) and (5), due to the preliminary injunction granted to the Securities and Exchange Commission freezing the defendant's assets, the representation of Mr. Rodrigues has resulted in an unreasonable financial burden on this small law firm of two (2) attorneys, both of whom are representing Mr. Rodrigues in the instant matter.

WHEREFORE, the undersigned counsel respectfully requests that this Court grant him leave to withdraw from the representation of Sanderley Rodrigues de Vasconcelos in the above-captioned action.

Respectfully Submitted,

/s/ Ludovino Gardini
Ludovino Gardini, BBO # 568563
Perez Gardini, LLC
PO Box 6318
Boston, MA 02114
(617) 507-1779
Fax: (866) 520-1233
ludo@gardinilaw.com

CERTIFICATE OF SERVICE

I, Ludovino Gardini, certify that on August 17, 2015, the foregoing motion was electronically filed with the Court. Notice will be sent by e-mail to counsel of record through the Court's electronic filing system, and will be sent by first class mail to non-registered participants.

/s/ Ludovino Gardini